

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

THOMAS M. MOROUGHAN,

Plaintiff,

-against-

THE COUNTY OF SUFFOLK, SUFFOLK COUNTY  
POLICE DEPARTMENT, SUFFOLK DETECTIVES  
RONALD TAVARES, CHARLES LESER, EUGENE  
GEISSINGER, NICHOLAS FAVATTA and ALFRED  
CICCOTTO, DETECTIVE/SGT. WILLIAM J. LAMB,  
SGT. JACK SMITHERS, SUFFOLK POLICE OFFICERS  
WILLIAM MEANEY and JESUS FAYA and SUFFOLK  
JOHN DOES 1-10, THE COUNTY OF NASSAU,  
NASSAU COUNTY POLICE DEPARTMENT, SGT.  
TIMOTHY MARINACI, DEPUTY CHIEF OF PATROL  
JOHN HUNTER, INSPECTOR EDMUND HORACE,  
COMMANDING OFFICER DANIEL FLANAGAN,  
DETECTIVE/SGT. JOHN DEMARTINIS, NASSAU  
POLICE OFFICERS ANTHONY D. DILEONARDO,  
EDWARD BIENZ and JOHN DOES 11-20,

Defendants.

Case No.: 12-cv-0512  
(JFB)(AKT)

**DEFENDANT JOHN  
HUNTER'S NOTICE OF  
MOTION FOR  
SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that upon Defendant DEPUTY CHIEF OF PATROL JOHN HUNTER's ("Hunter") accompanying Memorandum of Law in Support of his Motion for Summary Judgment, the Declaration of Annemarie S. Jones in Support of Hunter's Motion for Summary Judgment with annexed exhibits, Hunter's Rule 56.1 Statement of Undisputed Material Facts, and upon all of the pleadings, papers and proceedings heretofore had herein, Hunter will move this Court before the Honorable Judge Joseph F. Bianco, at the United States Courthouse located at 100 Federal Plaza, Central Islip, New York 11722, at a date and time to be determined, for summary judgment, pursuant to Federal Rule of Civil Procedure 56 seeking dismissal of all claims asserted against Hunter.

Dated: Islandia, New York  
July 30, 2018

**LEWIS JOHS AVALLONE AVILES, LLP**

/s/

By: Annemarie S. Jones, Esq.  
One CA Plaza, Suite 225  
Islandia, New York 11749  
631.755.0101  
E-Mail: [asjones@lewisjohs.com](mailto:asjones@lewisjohs.com)

*Attorneys for Defendant  
Deputy Chief of Patrol John Hunter*

TO: Anthony M. Grandinette, Esq.  
LAW OFFICE OF ANTHONY M. GRANDINETTE  
114 Old Country Road, Suite 420  
Mineola, New York 11501  
(516) 877-5348  
E-Mail: [grandinetteesq@aol.com](mailto:grandinetteesq@aol.com)  
*Attorneys for Plaintiff*

Brian C. Mitchell, Esq.  
SUFFOLK COUNTY DEPT. OF LAW-COUNTY ATTORNEY  
100 Veterans Memorial Highway  
P.O. Box 6100  
Hauppauge, New York 11788  
(631) 853-4055  
E-Mail: [brian.mitchell@suffolkcountyny.gov](mailto:brian.mitchell@suffolkcountyny.gov)  
*Attorneys for Defendant  
The County of Suffolk, Suffolk County Police Department, Suffolk Detective Ronald  
Tavares, Charles Leser, William J. Lamb, William Meaney, Eugene Geissinger, Nicholas  
Favatta, Alfred Ciccotto, Sgt. Jack Smithers, Enid Nieves, Channon Rocchio, Jesus Faya*

Christopher D. Clarke, Esq.  
LEAHEY & JOHNSON, P.C.  
120 Wall Street  
New York, New York 10005  
(212) 269-7308  
E-Mail: [cclarke@leaheyandjohnson.com](mailto:cclarke@leaheyandjohnson.com)  
*Attorneys for Defendant Edmund  
The County of Nassau, Nassau County Police Department, Edward Bienz, Sgt. Timothy  
Marinaci, Edmund Horice, Commanding Officer Daniel Flanagan, Detective/Sgt. John  
Demartinis*

BARKET MARION EPSTEIN & KEARON, LLP

666 Old Country Road, Suite 700

Garden City, New York 11530

(516) 745-1500

E-mail: [amarion@barketmarion.com](mailto:amarion@barketmarion.com)

*Attorney for Defendant*

*Anthony D. DiLeonardo*